

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO.

<b>William Broussard, III</b>	:	
	:	
	:	
<b>Plaintiff(s),</b>	:	<b>MDL No. 2419</b>
	:	<b>Master Docket No. 1:13-md-2419-FDS</b>
<b>v.</b>	:	
	:	<b>Honorable F. Dennis Saylor</b>
	:	
<b>UNIFIRST CORPORATION, A/D/B/A</b>	:	
<b>UNICLEAN CLEANROOM</b>	:	
<b>SERVICES, NEW ENGLAND</b>	:	<b>DEMAND FOR JURY TRIAL</b>
<b>COMPOUNDING COMPANY, NEW</b>	:	
<b>HAMPSHIRE PAIN CARE CENTERS</b>	:	
	:	
<b>Defendants.</b>	:	

**CORRECTED SHORT FORM COMPLAINT  
AGAINST UNAFFILIATED DEFENDANTS**

Plaintiff(s), William Broussard III, complaining against the Defendants, allege(s) as follows:

**FIRST COUNT**

1. Pursuant to MDL Order No. 7, entered in In Re: New England Compounding Pharmacy, Inc. Products liability Litigation, Master Docket No. 1:13-md-2419-FDS, the undersigned counsel hereby submit this Short Form Complaint and Jury Demand against the Defendants, and adopt and incorporate by reference the allegations in the Plaintiffs' Master Complaint, with attachments, and any and all amendments thereto.

2. Plaintiff is a resident of the State of New Hampshire.
3. Plaintiff brings this action: On behalf of herself/himself.

4. Plaintiff asserts that the Plaintiff was administered New England Compounding Pharmacy, Inc. ("NECC") drug methylprednisolone acetate (hereinafter referred to as "NECC drug"), causing injuries and damages.

5. The aforesaid administration of the NECC drug occurred in: October of 2012, at Pain Care Centers New Hampshire (Somersworth), by Dr. Tung, located in Somersworth, New Hampshire.

6. Dr. Tung and healthcare facility Pain Care Centers of New Hampshire are hereinafter collectively referred to as "Clinic Related Defendants."

7. Plaintiff(s) adopt(s) and incorporate(s) by reference the following Causes of Action asserted against the Defendants in the Master Complaint:

- COUNT II: NEGLIGENCE AND GROSS NEGLIGENCE (Against UniFirst)
- COUNT III: NEGLIGENCE AND GROSS NEGLIGENCE (Against Clinic Related Defendants)
- COUNT IV: VIOLATION OF CONSUMER PROTECTION STATUTES (Against Clinic Related Defendants)
- COUNT VI: VIOLATION OF M.G.L. C. 93A (Against UniFirst)
- COUNT VII: BATTERY (Against Clinic Related Defendants)
- COUNT VIII: FAILURE TO WARN (Against Clinic Related Defendants)
- COUNT IX: TENNESSEE PRODUCT LIABILITY CLAIMS (Against Tennessee Clinic Related Defendants)
- COUNT X: AGENCY (Against Clinic Related Defendants)
- COUNT XI: CIVIL CONSPIRACY (Against Clinic Related Defendants)
- COUNT XII: WRONGFUL DEATH PUNITIVE DAMAGES (Against UniFirst and Clinic Related Defendants)
- COUNT XIII: LOSS OF CONSORTIUM (Against UniFirst and Clinic Related Defendants)



COUNT XIV: PUNITIVE DAMAGES (Against UniFirst and Clinic Related Defendants)

8. Plaintiff claims to have suffered the following injuries as a result of the administration of NECC's drug: Bodily injury, infection, pain, suffering, mental anguish, inconvenience.

9. Plaintiff claims to have suffered the following damages as a result of the administration of NECC's drug: Serious injuries, great pain of body and mind, lost earnings and earning capacity, permanent disability and deformity, great inconvenience and past and future hospital, doctors', and/or related expenses incurred in an effort to be cured of said injuries

10. The additional designated plaintiff(s) has suffered/have suffered/will continue to suffer the following: future pain and suffering, loss of consortium, future loss wages, continuing medical expenses, future lost profits.

WHEREFORE, Plaintiff(s) demand(s) Judgment against the Defendants awarding compensatory damages, punitive damages, attorneys' fees, interest, costs of suit, and such further relief as the Court deems equitable and just.

Plaintiff(s) reserve the right to amend this Complaint to add allegations and claims against individuals or entities currently omitted and to add or amend allegations against Defendants named herein based, in part, on further discovery.

WHEREFORE, Plaintiff Broussard moves the court for judgment against Defendants, in the sum of FIVE MILLION AND 00/100 DOLLARS (\$5,000,000.00) together with pre- and post-judgment interest and his costs in this behalf expended.

**JURY DEMAND**

Plaintiff(s) hereby demand(s) a trial by jury.

**Respectfully Submitted,**

**PLAINTIFF(S),**

**By (Their) Attorneys,**  
*Peter G. McGrath*

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Date: 8/10/25